



Matthew Rodriguez
Secretary for
Environmental Protection

California Regional Water Quality Control Board Los Angeles Region

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Edmund G. Brown Jr.
Governor

April 6, 2012

Ms. Janet Frentzel
Vice President, Environmental and Development Services
Prologis – Local Partner to Global Trade TM
Pier 1, Bay 1
San Francisco, CA 94111

SUBJECT: NO FURTHER ACTION FOR GROUNDWATER

**SITE: LOS NIETOS BUSINESS CENTER SITE 9120-9169 SOUTH NORWALK
BOULEVARD, SANTA FE SPRINGS, CALIFORNIA (SCP CASE NO. 883,
SITE ID NO. 2047K00)**

Dear Ms. Frentzel:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the State regulatory agency responsible for protecting surface water and ground water quality for all beneficial uses within major portions of Los Angeles County and Ventura County, including the above-referenced site. To accomplish this, the Regional Board oversees the soil and groundwater investigations and cleanup of unregulated discharges adversely or potentially affecting the State's waters, as authorized by the Porter-Cologne Water Quality Control Act (California Water Code [CWC], Division 7).

Regional Board staff has reviewed the case file to evaluate a no further action for groundwater for the subject site as requested by you in our meeting on January 12, 2012. The Regional Board had already granted soil closure for the site per our letter dated December 16, 1999.

The Los Nietos Business Center Site (Site) is situated on an irregularly shaped 11.7-acre parcel of land located from 9120 to 9169 South Norwalk Boulevard, and at 11925 and 11933 East Los Nietos Road, in Santa Fe Springs, California. From 1924 to 1953, the Site was occupied by the California Fishing Tool and Machine Company (CFTMC) which manufactured down-hole oil well production equipment involving such processes as cutting, honing, grinding, spray welding, grit blasting, painting, heat treating, and cleaning. Source areas consisted of the following: four underground storage tanks (USTs) [oil separator, a 625-gallon hydraulic oil tank, a circulation sump, an oil clarifier, a sump in Machine Shop II, which were removed and closed under Los Angeles County Department of Public Works (LACDPW) on February 13, 1990], French drains, dry wells, storage areas, and stained areas. Prologis, Inc. has been the current property owner since June 3, 2011 when AMB Properties merged with Prologis, Inc.

SOIL INVESTIGATION

Due to the historical land use at the Site, the shallow soils underlying the Site have been impacted primarily by Total Petroleum Hydrocarbons (TPH), and Title 22 metals, along with very low concentrations of volatile organic compounds (VOCs) at a few locations. Maximum TPH concentrations detected in soil samples collected from various areas at the site were 87,000 milligrams per kilogram (mg/kg) at 0.5 feet below ground surface (bgs), 24,000 mg/kg at 1 foot bgs, 16,000 mg/kg at 2 feet bgs, 3,700 mg/kg at 4 feet bgs, 2,500 mg/kg at 5 feet bgs, 2,500 mg/kg at 12 feet bgs, and 11,000 mg/kg at 48 feet bgs. Maximum chromium concentrations of 1,620 mg/kg were detected in soil samples at 0.5 foot bgs, 72 mg/kg at 1 foot bgs, and 66 mg/kg at 2 feet bgs. Lead was detected at a maximum 689 mg/kg at 0.5 foot bgs, 117 mg/kg at 1 foot bgs, and 166 mg/kg at 2 feet bgs. A total of 14 soil samples were collected from the Los Nietos site and analyzed for VOCs: VOCs were not detected in ten samples; and PCE and toluene were detected at the maximum concentrations of 76 μ g/kg and 93 μ g/kg, respectively, in the four remaining soil samples.

SOIL REMEDIATION AND CLOSURE

On December 16, 1999, the Regional Board granted soil closure for the Site based on excavation and offsite disposal of approximately 10,000 cubic yards of contaminated soils satisfying cleanup criteria of 100 parts per million for TPH, and 10 times the soluble threshold limit concentration (STLC) for metals. Since these soils were excavated from source areas that may have contained VOCs, it was assumed that the potentially VOC-contaminated soil was removed along with TPH and metals.

GROUNDWATER INVESTIGATION AND MONITORING

Five groundwater monitoring wells (MW-1 through MW-5) were installed at the Site by AGI in 1995. In September 1999, one additional monitoring well (MW-6) was advanced to a depth of 58 feet bgs. Groundwater was first encountered in well MW-6 at 50 feet bgs. The contaminants detected in groundwater samples collected from onsite wells consisted primarily of tetrachloroethene (PCE), trichloroethene (TCE), 1,1-dichloroethane (1,1-DCA), 1,2-dichloroethane (1,2-DCA), 1,1-dichloroethene (1,1-DCE), chloroform, carbon tetrachloride (CTC), toluene, and selected Title 22 metals such as hexavalent chromium (CrVI), lead, cadmium (Cd), chromium (Cr), nickel (Ni), selenium (Se), and silver (Ag).

Based on the information provided in the *Final Remedial Investigation/feasibility Study Reports Omega Chemical Corporation Superfund Site Operable Unit 2, Los Angeles County, California Volume 1* dated August 2010 (Omega RI or RI), the highest VOC contamination in groundwater was found in an upgradient monitoring well located at the eastern boundary of the Los Nietos Site, which indicates that the contamination may be migrating from the offsite sources. The offsite sources located upgradient and cross gradient to the Site include: Phibro-Tech, Pilot Chemical Company, Techni-Braze, and McKesson Chemical. Phibro-Tech, Pilot Chemical Company, and McKesson Chemical are under the regulatory oversight of the Department of

Toxic Substances Control, Chatsworth, and Techni-Braze is being overseen by the Los Angeles Regional Board.

OFFSITE SOURCES OF GROUNDWATER CONTAMINATION

There is no onsite soil data that suggest that the subject site is the source of contamination of the groundwater underlying the subject site. The Regional Board staff reviewed and compared the VOC data collected during groundwater monitoring of the onsite wells from April 1996 through November 2008 with the data from the upgradient and offsite facilities including the hydraulically upgradient Phibro Tech, Pilot Chemical Company, and Techni-Braze, and the cross-gradient McKesson Chemical provided in the Omega RI; and a report dated August 12, 1999 on the Los Nietos Site by Clayton Environmental Consultants (Clayton). The Omega RI reported: chromium (30,000 mg/kg), copper (26,000 mg/kg), TPH (33,500 mg/kg), TCE (110,000 µg/kg), PCE (1,200 µg/kg), 1,1,1-TCA (2,900 µg/kg), in soil based on 1985 site investigations; and 19,000 µg/L of CrVI, 1,100 µg/L of TCE, 23 µg/L of PCE, 74 µg/L of chloroform, and 37 µg/L of carbon tetrachloride (CCL4) in the October 2006 groundwater sampling event from the Phibro-Tech site. The RI reported a maximum concentration of PCE in soil at 92,000 µg/kg, and a maximum concentration of 14,000 µg/L of PCE detected during 1995 at the Techni-Braze site. The RI also reported about the Los Nietos site (Site C): "The highest VOC concentrations in groundwater are found in upgradient monitoring well in the eastern portion of the property, indicating the contamination may be migrating to Site C from offsite sources. Phibro-Tech and Site B are located upgradient of Site C; Pilot Chemical Company and Site F are located further upgradient." PCE was reported by Clayton at 780 ug/L from the Techni-Braze site; TCE from the Pilot Chemical site reported at 650 ug/L; and TCE, 1,1-DCA, 1,2-DCA, CCL4, and CCL3 from the Phibro-Tech site reported respectively at 57, 19, 2.9, 180, and 72 ug/L. Phibro-Tech has signed a Corrective Action Consent Order with DTSC in March 2012, and will conduct in-situ treatment of hexavalent chromium and VOC contamination by injection of calcium polysulfide. The Regional Board issued Waste Discharge Requirements (WDR) on November 30, 2009 to Phibro-Tech. According to a February 6, 2012 letter from IRIS Environmental (consultant for Phibro-Tech) to the Regional Board, the WDR program has not been initiated yet because of decrease in groundwater levels in the pilot test area.

These offsite VOCs concentrations are orders of magnitude higher than the onsite VOCs. Although, most of the soil samples were analyzed for petroleum hydrocarbons only, and 14 samples were analyzed for VOCs, however, as reported in the documents in our case file, tetrachloroethene and toluene were detected at a maximum concentration of 76 µg/kg and 93 µg/kg, respectively. Therefore, the Site soils do not appear to be the source of VOCs in the underlying groundwater. Additionally, the south-southwestward migration of the offsite VOC plumes along the groundwater flow direction has been historically impacting the site groundwater.

April 6, 2012

JUSTIFICATION FOR GROUNDWATER NO FURTHER ACTION

Staff reviewed the VOC data collected during groundwater monitoring of the onsite wells from April 1996 through November 2008 and compared these data with the available groundwater analytical data from the upgradient and offsite facilities (the hydraulically upgradient Phibro Tech, Pilot Chemical Company, and Techni Braze, and the cross-gradient McKesson Chemical) in the Omega RI Report and Clayton report. Fourteen 14 soil samples were collected from the Los Nietos site and analyzed for VOCs. VOCs were not detected in ten samples, and PCE and toluene were detected at the maximum concentrations of 76 $\mu\text{g/kg}$ and 93 $\mu\text{g/kg}$, respectively, in the four remaining soil samples. The soil and groundwater data show that there are no onsite soil data demonstrating that the subject site is the source of VOC contamination (mainly, PCE, TCE and CrVI) of the groundwater underlying the site. Therefore, a No Further Action (NFA) determination is granted for groundwater beneath the Site.

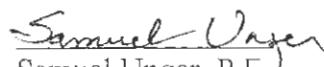
NOTIFICATION

To prevent any future threat to human health and the environment, if contamination is encountered during any future activities at the Site, current or any future Site owners and operators are required to immediately provide a verbal notification to this Regional Board and submit a follow-up written report within 72 hours. Please note that you will continue to receive oversight cost invoices in the coming billing quarters from the State Water Resources Control Board for Regional Board staff oversight charges for work associated with the groundwater closure letter, the case review and evaluation package and closing the files.

It is our understanding that USEPA would like to continue groundwater monitoring of the wells located at your site, and we encourage you to cooperate with USEPA in this matter, and directly contact Ms. Lynda Deschambault (415) 947-4183 or deschambault.lynda@epa.gov.

If you have any questions or comments, please contact the project manager, Mr. Mohammad Zaidi, at (213) 576-6732 (mzaidi@waterboards.ca.gov), or the Unit Chief, Dr. Kwangil Lee, at (213) 576-6734 (klee@waterboards.ca.gov).

Sincerely,


Samuel Unger, P.E.
Executive Officer

CC(Copies sent by email to):
Mr. Scot Allin, URS Corporation
Ms. Lynda Deschambault, USEPA Region IX